

RUBIN LLC
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Counsel for Westchester Avenue Mixed Use LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:
In re:	: Chapter 7
	:
GUALACEO REALTY CORP,	: Case No.: 22-22099-rdd
	:
Debtor.	:
----- X	

**NOTICE OF APPEARANCE AND REQUEST
FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE the undersigned hereby appears as counsel for Westchester Avenue Mixed Use LLC (the “Notice Party”), a party in interest in the above-captioned case. Pursuant to sections 342 and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 2002, 3017, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Notice Party requests that all notices given or that are required to be given and all pleadings and orders that are served or required to be served in the above-captioned chapter 7 case, or in proceedings related thereto, be served at the following addresses:

Rubin LLC
345 Seventh Avenue, 21st Floor
New York, New York 10001
Tel: 212. 390.8054
Fax: 212.390.8064
Attention: Paul A. Rubin
Hanh Huynh
E-mail: prubin@rubinlawllc.com
hhuynh@rubinlawlllc.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices, pleadings, orders, and other papers referred to in the Bankruptcy Code sections and the Bankruptcy Rules specified above, but also includes, without limitation, all other notices, papers, applications, motions, petitions, pleadings, requests, complaints, answering or reply papers, plans, disclosure statements, reports, and demands, including all amendments to the foregoing, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, electronic mail, or otherwise, which affects the chapter 7 case or any proceedings related thereto, the above-captioned Debtor, property in its possession, custody, or control, the administration of the Debtor's bankruptcy case, or the rights of creditors or other parties in interest, or which affects the Notice Party.

PLEASE TAKE FURTHER NOTICE that the Notice Party does not intend, nor shall it be deemed, through this Notice of Appearance and Request for Service of Papers, or any subsequent appearance, pleading, claim, suit, or conduct, to waive any substantive or procedural rights, including, without limitation, (i) its rights to have a United States District Judge determine de novo all non-core proceedings (and all core proceedings as to which the Bankruptcy Court lacks authority to enter judgments or final orders), (ii) its rights to a trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) its rights to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any right to object to the jurisdiction of the Bankruptcy Court, or

to venue in the Southern District of New York, for any purpose other than with respect to this Notice of Appearance and Request for Service of Papers, or (v) any other rights, claims, actions, defenses, setoffs, recoupments, or remedies to which it is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, recoupments, and remedies the Notice Party expressly reserves.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall not be construed as an appointment of any person or entity as authorized agents of the Notice Party, either expressly or impliedly, for purposes of receiving service of process pursuant to Rule 7004 of the Bankruptcy Rules or Rule 4 of the Federal Rules of Civil Procedure.

Dated: New York, New York
March 14, 2022

RUBIN LLC

By: /s/ Paul A. Rubin
Paul A. Rubin

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